

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN MEDINA-JASSO,

Defendant.

Case No. 1:25-cr-076

**MOTION FOR LEAVE TO
DISMISS INDICTMENT**

The United States of America, by Jennifer Klemetsrud Puhl, Acting United States Attorney for the District of North Dakota, and Nick Baker, Assistant United States Attorney, pursuant to Rule 48(a), F.R.Crim.P., moves the court for leave to dismiss the indictment (Doc. 1 and 2); and moves the Court to quash the writ of habeas corpus (Doc. 7); to cancel the arraignment scheduled for April 22, 2025; and to release the defendant from any pretrial conditions previously issued by the Court (Doc. 17 in Case No. 1:25-mj-00170), for the reasons set forth herein.

The defendant was charged by way of criminal complaint on March 6, 2025 in Case No. 1:25-mj-00170. On April 2, 2025, the defendant was conditionally released. (Doc. 17 in Case No. 1:25-mj-00170). Due to an Immigration and Customs Enforcement (ICE) administrative detainer, the defendant was taken into ICE custody.

The defendant was indicted on a charge of Re-Entry of Removed Alien on April 2, 2025. At the request of the United States, the Court issued a writ of habeas corpus directing that the defendant appear at an arraignment on April 22, 2025.

The United States has been advised by ICE that the administrative removal process would be implemented on April 9, 2025. Therefore, the United States respectfully moves the Court to:

1. Dismiss the Indictment (Doc. 1 and 2);
2. Quash the writ of habeas corpus (Doc. 7);
3. Cancel the arraignment scheduled for April 22, 2005; and
3. Release the defendant from any pretrial conditions previously issued by the Court. (Doc. 17 in Case No. 1:25-mj-00170).

Dated: April 11, 2025

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